

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

WESTERN DISTRICT OF WASHINGTON

Case number (if known)

Chapter 11

Check if this an amended filing

**Official Form 201**

**Voluntary Petition for Non-Individuals Filing for Bankruptcy**

4/16

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name	<u>Western Industrial LLC</u>		
2. All other names debtor used in the last 8 years	Include any assumed names, trade names and <i>doing business as</i> names		
3. Debtor's federal Employer Identification Number (EIN)	<u>91-1679642</u>		
4. Debtor's address	Principal place of business  <u>11709 Cyrus Way</u> <u>Mukilteo, WA 98275</u> Number, Street, City, State & ZIP Code	Mailing address, if different from principal place of business  P.O. Box, Number, Street, City, State & ZIP Code	Location of principal assets, if different from principal place of business  Number, Street, City, State & ZIP Code
5. Debtor's website (URL)	<u>westernindustrialinc.com</u>		
6. Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify: _____		

**7. Describe debtor's business** A. *Check one:*

- Health Care Business (as defined in 11 U.S.C. § 101(27A))
- Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- Railroad (as defined in 11 U.S.C. § 101(44))
- Stockbroker (as defined in 11 U.S.C. § 101(53A))
- Commodity Broker (as defined in 11 U.S.C. § 101(6))
- Clearing Bank (as defined in 11 U.S.C. § 781(3))
- None of the above

B. *Check all that apply*

- Tax-exempt entity (as described in 26 U.S.C. §501)
- Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.  
 See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

*Check one:*

- Chapter 7
- Chapter 9
- Chapter 11. *Check all that apply:*

- Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,566,050 (amount subject to adjustment on 4/01/19 and every 3 years after that).
- The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- A plan is being filed with this petition.
- Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

- Chapter 12

**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

No.

Yes.

If more than 2 cases, attach a separate list.

District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_

District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

No

Yes.

List all cases. If more than 1, attach a separate list

Debtor **See Attachment** Relationship \_\_\_\_\_

District \_\_\_\_\_ When \_\_\_\_\_ Case number, if known \_\_\_\_\_

**11. Why is the case filed in this district?** *Check all that apply:*

Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.

A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

No

Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention? (Check all that apply.)**

It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

It needs to be physically secured or protected from the weather.

It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

Other \_\_\_\_\_

**Where is the property?**

Number, Street, City, State & ZIP Code \_\_\_\_\_

**Is the property insured?**

No

Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

### Statistical and administrative information

<b>13. Debtor's estimation of available funds</b>	<i>Check one:</i>		
	<input checked="" type="checkbox"/> Funds will be available for distribution to unsecured creditors.		
	<input type="checkbox"/> After any administrative expenses are paid, no funds will be available to unsecured creditors.		
<b>14. Estimated number of creditors</b>	<input type="checkbox"/> 1-49	<input type="checkbox"/> 1,000-5,000	<input type="checkbox"/> 25,001-50,000
	<input checked="" type="checkbox"/> 50-99	<input type="checkbox"/> 5001-10,000	<input type="checkbox"/> 50,001-100,000
	<input type="checkbox"/> 100-199	<input type="checkbox"/> 10,001-25,000	<input type="checkbox"/> More than 100,000
	<input type="checkbox"/> 200-999		
<b>15. Estimated Assets</b>	<input type="checkbox"/> \$0 - \$50,000	<input checked="" type="checkbox"/> \$1,000,001 - \$10 million	<input type="checkbox"/> \$500,000,001 - \$1 billion
	<input type="checkbox"/> \$50,001 - \$100,000	<input type="checkbox"/> \$10,000,001 - \$50 million	<input type="checkbox"/> \$1,000,000,001 - \$10 billion
	<input type="checkbox"/> \$100,001 - \$500,000	<input type="checkbox"/> \$50,000,001 - \$100 million	<input type="checkbox"/> \$10,000,000,001 - \$50 billion
	<input type="checkbox"/> \$500,001 - \$1 million	<input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> More than \$50 billion
<b>16. Estimated liabilities</b>	<input type="checkbox"/> \$0 - \$50,000	<input checked="" type="checkbox"/> \$1,000,001 - \$10 million	<input type="checkbox"/> \$500,000,001 - \$1 billion
	<input type="checkbox"/> \$50,001 - \$100,000	<input type="checkbox"/> \$10,000,001 - \$50 million	<input type="checkbox"/> \$1,000,000,001 - \$10 billion
	<input type="checkbox"/> \$100,001 - \$500,000	<input type="checkbox"/> \$50,000,001 - \$100 million	<input type="checkbox"/> \$10,000,000,001 - \$50 billion
	<input type="checkbox"/> \$500,001 - \$1 million	<input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> More than \$50 billion

**Request for Relief, Declaration, and Signatures**

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 24, 2016  
MM / DD / YYYY

**X /s/ Mark L Jackson**

Signature of authorized representative of debtor

**Mark L Jackson**

Printed name

Title President

**18. Signature of attorney**

**X /s/ Jeffrey B. Wells**

Signature of attorney for debtor

Date June 24, 2016

MM / DD / YYYY

**Jeffrey B. Wells**

Printed name

**Wells and Jarvis, P.S.**

Firm name

**500 Union Street, Ste. 502  
Seattle, WA 98101**

Number, Street, City, State & ZIP Code

Contact phone (206) 624-0088

Email address paralegal@wellsandjarvis.com

**6317**

Bar number and State

Debtor **Western Industrial LLC**  
Name \_\_\_\_\_

Case number (*if known*) \_\_\_\_\_

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

WESTERN DISTRICT OF WASHINGTON

Case number (*if known*) \_\_\_\_\_ Chapter **11**

Check if this an  
amended filing

**FORM 201. VOLUNTARY PETITION**

**Pending Bankruptcy Cases Attachment**

Debtor	<b>Cyrus Way Holdings, LLC</b>	Relationship to you	<b>Landlord of Debtor, same owner</b>
District	<b>Western District of Washington</b>	When _____	<b>Not yet filed</b>
Debtor	<b>Mark Lee Johnson</b>	Relationship to you	<b>President/owner</b>
District	<b>Western District of Washington</b>	When _____	<b>not yet filed</b>

Fill in this information to identify the case:

Debtor name	Western Industrial LLC
United States Bankruptcy Court for the:	WESTERN DISTRICT OF WASHINGTON
Case number (if known):	

Check if this is an  
amended filing

## Official Form 204

### Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
AGC Plan 5446 California Ave SW Ste 200 Seattle, WA 98136						\$158,080.93
American Longshore Mutual Ass. RSA battle House Tower 32nd Floor 11 North Water Street Mobile, AL 36602						\$183,429.00
Blast-One International AR 2400 Landmark Way Columbus, OH 43219-3658						\$23,952.98
BMW Financial PO Box 3608 Dublin, OH 43016		Secured on vehicle owned personally by Mark Jackson				\$39,726.00
Business Card PO Box 15796 Wilmington, DE 19886-5796						\$19,096.79
Dryco West LLC 5400 Janes Ave Downers Grove, IL 60515						\$31,754.25
Grainger Dept 840452221 PO Box 419267 Kansas City, MO 64141-6267						\$24,688.86

Debtor	Western Industrial LLC Name				Case number (if known)	
Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Industrial Vacuum Equipment In N7959 Birch Road Ixonia, WI 53036						\$18,936.92
Internal Revenue Service Central Insolvency Operation PO Box 7346 Philadelphia, PA 19101-7346				\$651,232.00	\$0.00	\$651,232.00
International Paint LLC 6001 Antoine Drive Houston, TX 77091						\$179,021.00
Jetstream of Houston LLP PO Box 203706 Dallas, TX 75320-3706						\$27,974.88
Kleen Blast 50 Oak Court Suite 210 Danville, CA 94526						\$58,349.94
Laborworks Industrial Staffing PO Box 1755 Gig Harbor, WA 98335						\$20,809.16
PPG Protective & Marine CTGGS PO Box 842409 Boston, MA 02284-2409						\$78,049.75
Rogers Machinery Company Inc PO Box 230429 Portland, OR 97821						\$23,843.63
Schwabe Williamson & Wyatt PC 1211 SW Fifth Ave, Ste 1900 Portland, OR 97204-3795		Attorney fees				\$187,098.50
Sherwin Williams 2940 Sixth Ave S Seattle, WA 98134						\$78,564.40
Sunbelt PO Box 409211 Atlanta, GA 30384-9211						\$40,070.10

Debtor **Western Industrial LLC** \_\_\_\_\_ Case number (*if known*) \_\_\_\_\_  
 Name \_\_\_\_\_

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Tradesmen International, LLC PO Box 842227 Boston, MA 02284-2227						\$96,332.55
Western Safety Products 505 S Lander St Seattle, WA 98134						\$19,042.56

AGC PLAN  
5446 CALIFORNIA AVE SW STE 200  
SEATTLE, WA 98136

ALDERWOOD WATER & WASTEWATER  
3626 156TH ST SW  
LYNNWOOD, WA 98087

ALLIED WORLD SPECIALTY INSUR.  
C/O WATT TIEDER HOFFAR & FITZG  
1215 FOURTH AVE STE 2210  
SEATTLE, WA 98161-1016

AMERICAN EXPRESS  
PO BOX 650448  
DALLAS, TX 75265-0448

AMERICAN LONGSHORE MUTUAL ASS.  
RSA BATTLE HOUSE TOWER  
32ND FLOOR  
11 NORTH WATER STREET  
MOBILE, AL 36602

ANTHONY M. LEMOINE  
21836 13TH AVE S.  
SEATTLE, WA 98198

AT&T  
PO BOX 5025  
CAROL STREAM, IL 60197-5025

ATKINSON ANDELON LOYA RUUD  
12800 CENTER COURT DRIVE SOUTH  
CERRITOS, CA 90703-9364

ATKINSON, ANDELSON, LOYA, RUUD  
ATTN: JONATHAN VICK  
12800 CENTER COURT DRIVE  
STE. 300  
CERRITOS, CA 90703

AUTOMATION ELECTRIC & CONTROLS  
1117 DALE LANE - UNIT  
MOUNT VERNON, WA 98274

BALLARD TRANSFER CO OF WASHING  
2417 NW MARKET STREET  
SEATTLE, WA 98107-4138

BAROKAS MARTIN & TOMLINSON  
1422 BELLEVUE AVENUE  
SEATTLE, WA 98122

BELL PAINTINGS AND COATINGS  
7206 N 25TH ST  
TACOMA, WA 98406

BLAST-ONE INTERNATIONAL AR  
2400 LANDMARK WAY  
COLUMBUS, OH 43219-3658

BMW FINANCIAL  
PO BOX 3608  
DUBLIN, OH 43016

BRADY WORLDWIDE INC.  
PO BOX 71995  
CHICAGO, IL 60694-1995

BUSINESS CARD  
PO BOX 15796  
WILMINGTON, DE 19886-5796

CITY OF BREMERTON  
345 SIXTH STREET, SUITE 600  
BREMERTON, WA 98337-1873

CLICKSAFETY  
62274 COLLECTIONS CENTER DR  
CHICAGO, IL 60693-0622

COMCAST  
PO BOX 34744  
SEATTLE, WA 98124-1744

CORROSION CONTROL CONSULTANTS  
4403 DONKER COURT  
GRAND RAPIDS, MI 49512

CSI SERVICES, INC.  
PO BOX 801357  
SANTA CLARITA, CA 91380-2316

DONALDSON COMPANY INC  
1400 WEST 94TH ST  
MINNEAPOLIS, MN 55431

DRYCO WEST LLC  
5400 JANES AVE  
DOWNERS GROVE, IL 60515

ELECTRONIC BUSINESS MACHINES  
802 134TH ST SW #170  
EVERETT, WA 98204

FEDEX  
PO BOX 94515  
PALATINE, IL 60094-4515

FIRST BANKCARD #6123  
PO BOX 2818  
OMAHA, NE 68103-2818

FIRST SOUND BANK  
925 4TH AVENUE  
STE. 2350  
SEATTLE, WA 98104

FLOW INTERNATIONAL CORPORATION  
PO BOX 749647  
LOS ANGELES, CA 90074-9647

FRANCHISE TAX BOARD  
PO BOX 942857  
SACRAMENTO, CA 94257-0501

FRONTIER  
PO BOX 20550  
ROCHESTER, NY 14605-0550

GRAINGER  
DEPT 840452221  
PO BOX 419267  
KANSAS CITY, MO 64141-6267

HEALTH FORCE  
11805 NORTH CREEK PARKWAY S  
BOTHELL, WA 98011

INDUSTRIAL VACUUM EQUIPMENT IN  
N7959 BIRCH ROAD  
IXONIA, WI 53036

INSPEC TESTING INC  
1413 WILSON AVE  
NATIONAL CITY, CA 91950

INTERNAL REVENUE SERVICE  
CENTRAL INSOLVENCY OPERATION  
PO BOX 7346  
PHILADELPHIA, PA 19101-7346

INTERNATIONAL PAINT LLC  
6001 ANTOINE DRIVE  
HOUSTON, TX 77091

JETSTREAM OF HOUSTON LLP  
PO BOX 203706  
DALLAS, TX 75320-3706

KLEEN BLAST  
50 OAK COURT SUITE 210  
DANVILLE, CA 94526

KLEEN INDUSTRIAL SERVICES  
50 OAK COURT  
STE. 210  
DANVILLE, CA 94526

LABORWORKS INDUSTRIAL STAFFING  
PO BOX 1755  
GIG HARBOR, WA 98335

MARK JACKSON  
1101 12TH AVENUE N.  
EDMONDS, WA 98020

MOSS RUBBER AND EQUIPMENT CORP  
PO BOX 2944  
SOUTH SAN FRANCISCO, CA 94083

NMTA HEALTH TRUST  
C/O EPK & ASSOCIATES INC  
15375 SE 30TH PL #380  
BELLEVUE, WA 98007

NORTH SOUND HOSE & FITTINGS  
3520 PAINÉ ST #1  
EVERETT, WA 98201

NORTHWEST SANDBLASTING  
PO BOX 8056  
LACEY, WA 98509

O'CONNELL JETTING  
3195 "H" PARK ROAD  
BENICIA, CA 94510

PACO VENTURES LLC  
7400 2ND AVE S  
SEATTLE, WA 98108

PC CONSULTING, INC  
3600 WHITMAN AVE N #203  
SEATTLE, WA 98103

PERFECT TOUCH LANDSCAPE  
12414 HIGHWAY 99  
EVERETT, WA 98204

PERKINS GLASS & MIRROR  
1420 BROADWAY  
SEATTLE, WA 98122

PG&E  
BOX 997300  
SACRAMENTO, CA 95899-7300

PHILLIP PARSON  
23410 PHODODENDRON LANE NW  
POULSBO, WA 98370

PLATINUM SCAFFOLDING SERVICES  
WL BX 233734  
CHICAGO, IL 60689-5337

PONDER ENVIRONMENTAL SERVICES  
PO BOX 1427  
BENICIA, CA 94510-4427

PPG PROTECTIVE & MARINE CTGGS  
PO BOX 842409  
BOSTON, MA 02284-2409

PREMIER SCAFFOLD INC  
4709 KIMBER AE  
BAKERSFIELD, CA 93307

PROPEL INSURANCE  
PO BOX 2940  
TACOMA, WA 98401-2940

PUD OF SNOHOMISH COUNTY  
PO BOX 1100  
EVERETT, WA 98205-1100

PUGET SOUND ENERGY  
BOT-01H  
BELLEVUE, WA 98009-9269

RAG MAN INC.  
14676 SE 82ND DR  
CLACKAMAS, OR 97015

RAPID PREP LLC  
44 CROSS PARK AVE  
NORTH KINGSTOWN, RI 02852

ROGERS MACHINERY COMPANY INC  
PO BOX 230429  
PORTLAND, OR 97821

SCHWABE WILLIAMSON & WYATT PC  
1211 SW FIFTH AVE, STE 1900  
PORTLAND, OR 97204-3795

SEATTLE RADIATOR  
PO BOX 80036  
SEATTLE, WA 98108-0036

SHELL FLEET PLUS  
PO BOX 183019  
COLUMBUS, OH 43218-3019

SHERWIN WILLIAMS  
2940 SIXTH AVE S  
SEATTLE, WA 98134

SNYDER DISCOUNT OIL  
PO BOX 82223  
KENMORE, WA 98028-0223

SOUND TESTING INC  
PO BOX 16204  
SEATTLE, WA 98116

SRS INC.  
18420 68TH AVE S #202  
KENT, WA 98032

SSPC  
PO BOX 536030  
PITTSBURGH, PA 15253-5902

SUNBELT  
PO BOX 409211  
ATLANTA, GA 30384-9211

TACOMA SCREW PRODUCTS, INC.  
11630 AIRPORT ROAD  
EVERETT, WA 98204

TIDELANDS AVE PROPERTIESLLC  
PO BOX 658  
OCEANSIDE, CA 92049

TRADESMEN INTERNATIONAL, LLC  
PO BOX 842227  
BOSTON, MA 02284-2227

TREASURER OF VIRGINIA  
PO BOX 570  
RICHMOND, VA 23218-0570

UNITED WESTERN SUPPLY COMPANY  
PO BOX 83149  
PORTLAND, OR 97283

VERIZON WIRELESS  
PO BOX 660108  
DALLAS, TX 75266-0108

VIEWPOINT  
PO BOX 205100  
DALLAS, TX 75320-5100

WA STATE DEPARTMENT OF REVENUE  
PO BOX 47476  
OLYMPIA, WA 98504

WA STATE SUPPORT REGIS  
PO BOX 45868  
OLYMPIA, WA 98504-5868

WASHINGTON MARINE CLEANING LLC  
3430 16TH STREET  
EVERETT, WA 98201

WASTE MANAGEMENT - NORTHWEST  
PO BOX 541065  
LOS ANGELES, CA 90054-1065

WELLS FARGO  
C/O LANE POWELL PC  
PO BOX 91302  
SEATTLE, WA 98111-9402

WESTERN FIRE & SAFETY CO INC  
2446 NW MARKET STREET  
SEATTLE, WA 98107

WESTERN HOSE & GASKET  
325 WEST 30TH STREET  
NATIONAL CITY, CA 91950

WESTERN SAFETY PRODUCTS  
505 S LANDER ST  
SEATTLE, WA 98134

WETERN MOUNTAIN TRANSPORT  
4130 SW 117TH AVE PMB #414  
BEAVERTON, OR 97005-8999

WILLIAMS KASTNER & GIBBS PLLC  
PO BOX 21926  
SEATTLE, WA 98111-3926

**United States Bankruptcy Court**  
**Western District of Washington**

In re **Western Industrial LLC**

Debtor(s)

Case No.  
Chapter

**11**

**CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)**

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for Western Industrial LLC in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

- None [Check if applicable]

**June 24, 2016**

Date

*/s/ Jeffrey B. Wells*

**Jeffrey B. Wells**

Signature of Attorney or Litigant  
Counsel for **Western Industrial LLC**

**Wells and Jarvis, P.S.**

**500 Union Street, Ste. 502**

**Seattle, WA 98101**

**(206) 624-0088 Fax:(206) 624-0086**

**paralegal@wellsandjarvis.com**